

DAVID L. ANDERSON (CABN 149604)  
 United States Attorney  
 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division  
 PAMELA T. JOHANN (CABN 145558))  
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36045  
 San Francisco, California 94102  
 Telephone: (415) 436-7025  
 Facsimile: (415) 436-7234  
 pamela.Johann@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

THE CENTER FOR INVESTIGATIVE  
 REPORTING and JENNIFER GOLLAN,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
 LABOR,

Defendant.

) Case No. 18-cv-02414-DMR

) **STIPULATION REGARDING PROPOSED**  
 ) **FORM OF JUDGMENT**

Pursuant to the Court's Order dated June 4, 2020, the parties met and conferred regarding a proposed form of judgment. The parties hereby stipulate as follows:

1. The parties submit the proposed form of judgment attached hereto as Exhibit A.

2. Defendant agrees to the judgment as to form and reserves all rights to appeal the order and judgment. In the event that Defendant appeals the order and judgment, Defendant reserves the right to seek a stay of the judgment insofar as it requires production of records within 60 days.

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1 DATED: June 18, 2020

Respectfully submitted,

2 DAVID L. ANDERSON  
United States Attorney

3 /s/ Pamela T. Johann  
4 PAMELA T. JOHANN  
Assistant United States Attorney

5 Attorneys for Defendant

6  
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8 DATED: June 18, 2020

THE CENTER FOR INVESTIGATIVE  
REPORTING

9 /s/ D. Victoria Baranetsky  
10 D. VICTORIA BARANETSKY

11 Attorneys for Plaintiffs

12  
13 ATTESTATION

14 I, Pamela T. Johann, hereby attest that I have obtained the concurrence in the filing of this  
15 document from D. Victoria Baranetsky.

16  
17 /s/ Pamela T. Johann  
PAMELA T. JOHANN

# Exhibit A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

THE CENTER FOR INVESTIGATIVE  
REPORTING and JENNIFER GOLLAN,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
LABOR,

Defendant.

) Case No. 18-cv-02414-DMR

) **[PROPOSED] JUDGMENT**

On June 4, 2020, the Court granted Plaintiff's cross-motion for summary judgment in part and denied Defendant's motion for summary judgment. Dkt. No. 41. In accordance with that Order, and pursuant to Federal Rule of Civil Procedure 58, the Court hereby enters judgment in favor of Plaintiffs and against Defendant. Within 60 days from the date of this Judgment, Defendant must produce the OSHA Form 300A records identified in the search conducted on February 6, 2018 as responsive to Plaintiffs' FOIA request. The Clerk of Court shall close the file in this matter.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. DONNA M. RYU  
United States Magistrate Judge